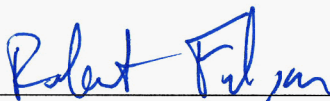


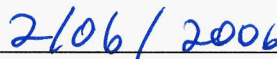
CERTIFICATION OF CPNI FILING (FEBRUARY 6, 2006)
EB-06-TC-060; EB DOCKET NO. 06-36

I, Robert Felgar, certify and state that:

1. I am the General Counsel of Startec Global Operating Company ("Startec") and have personal knowledge of Startec's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, Startec's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. A further statement outlining Startec's operating procedures and compliance is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e)



Robert Felgar, General Counsel



Date

Exhibit A

Explanation of Operating Procedures Ensuring Compliance

I. Overview

Startec Global Operating Company (“Startec”) provides service in only the interexchange category. Accordingly, pursuant to section 64.2005(a), Startec may use CPNI to market various service offerings to its customers without obtaining their opt-in approval. Startec does not provide its customers’ CPNI to third parties, such as joint venture partners or independent contractors.

II. Safeguards

- (a) Startec’s marketing department is required to keep an electronic record of their own and their affiliates’ sales and marketing campaigns that use their customers’ CPNI.
- (b) In the event that Startec provides its customers’ CPNI to third parties, such as joint venture partners or independent contractors, *which Startec is currently not doing*, Startec will fully comply with the requirements and safeguards set forth in section 64.2007(b)(2). Startec’s marketing department has been instructed not to provide CPNI to any third party without the involvement and approval of Startec’s legal department.
- (c) In the event that Startec begins to offer services in different service categories, Startec will not use CPNI to market to a customer, service offerings that are not within a category of service to which the customer already subscribes, unless Startec obtains the required customer approval as set forth in sections 64.2007 and 65.2008 of the FCC’s rules. Startec’s marketing department has been instructed to inform its legal department in the event that it plans to offer services in a new service category. At that time, Startec’s legal department will instruct marketing on how it may obtain customer approvals in order to use the CPNI.

- (d) Startec has trained its employees that CPNI cannot be divulged to any third parties or otherwise used in any manner beyond that which it is currently being used, without seeking the advice and approval of its legal department. Startec's legal department has reviewed, and is familiar with, the FCC's CPNI rules. Any violator of this policy will be referred to a CPNI committee consisting of the General Counsel, Senior Vice President of Marketing and Director of Human Resources. The committee has the authority to discipline employees in the manner it deems appropriate given the facts at issue. Such discipline may include termination.
- (e) Startec must maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Records will be maintained for one year.
- (f) Use of CPNI is closely monitored and reviewed by Startec's legal department. The marketing department must obtain approval from the legal department prior to any out-bound marketing request for customer approval.